

F I L E D
Clerk
District Court

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MAR - 9 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

6 *Attorneys for Plaintiff Antonio S. Camacho*

7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE**
9 **COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

10 **ANTONIO S. CAMACHO**) **CIVIL CASE NO. 05-0043**
11)
12 **Plaintiff,**)
13)
14)
15 **vs.**) **PLAINTIFF'S CASE MANAGEMENT**
16) **CONFERENCE STATEMENT**
17 **COMMONWEALTH OF THE**)
18 **NORTHERN MARIANA ISLANDS,**)
19 **MARIANAS PUBLIC LANDS**)
20 **AUTHORITY, successor to the Marianas**)
21 **Public Lands Corporation, and**) **DATE:** MAR 15 2006
22 **DEPARTMENT OF PUBLIC WORKS,**)
23)
24)
25 **Defendants.**) **TIME:** 9:30 AM
26)
27)
28)

ORIGINAL

1 Plaintiff, by and through counsel, and in accordance with Rule 16(b) and (c),
2 Fed.R.Civ.Pro. and Local Rule 16(e)(2), hereby submits his Case Management Conference
3 Statement.

4

5 **I.**

6 **INTRODUCTION**

7 Through this action, Plaintiff seeks damages for a taking of land for public use without
8 just compensation. This action involves only one Plaintiff, and seeks damages for the fair
9 market value of the land at the time of taking along with interest and attorneys fees.
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12 **II.**

13 **CASE MANAGEMENT STATEMENT**

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16 (a) The various Defendants have been duly served.

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18 (b) Plaintiff believes the Court has jurisdiction and the venue properly lies with this
19 Court as well.

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21 (c) Plaintiff anticipates he may file a Motion for Summary Judgment.

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24 (d) Plaintiff does not anticipate the need for any special procedures.

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1 (e) Plaintiff believes this case should be assigned the Expedited Track because of
2 the limited issues and their relative simplicity combined with the limited number of witnesses.
3 Plaintiff anticipates discovery will be necessary and requests that the parties be allowed the
4 limit for discovery set forth in the Expedited Tract. Plaintiff anticipates discovery can be
5 accomplished within four months with a trial within six to nine months.
6

7

8 (f) This case should be readily resolvable. Plaintiff therefore requests a settlement
9 conference within the month of April 2006 before litigation costs impede the possibility of
10 settlement. Plaintiff is open to any reasonable settlement offer provided it truly is fair and made
11 early enough to avoid expensive litigation costs. This matter may be justly, efficiently and
12 economically resolved if there is a settlement conference before litigation costs impede
13 settlement prospects.

14
15 Dated: March 9, 2006

O'CONNOR BERMAN DOTT & BANES
Attorneys for Plaintiff Antonio S. Camacho

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17 By: 
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20 GEORGE L. HASSELBACK (F0325)